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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re:

Scott A. Anderson

Laura L. Anderson

Debtors

Case No. 09-45595
Hearing Date: March 1, 2010
Hearing Time: 9:00 AM
Courtroom: 28
The Honorable Michael McManus
Docket Control No.: RIN-02

MOTION FOR ORDER COMPELLING ABANDONMENT OF THE
ESTATE'S INTEREST IN DEBTORS' BUSINESS

Michael Rinne of Rinne Legal, on behalf of Scott A. Anderson and Laura L. Anderson, the Debtors herein, hereby moves this Court for an Order Compelling Abandonment of the Estate's interest in the Debtors' Business. This Motion is based on the following facts:

1. This case was commenced with the filing of a petition on November 23, 2009. Sheri Carello was duly appointed to serve as Trustee.
2. As shown in the filed schedules of this case, the Debtors operate a business, Anderson Family Childcare. Said business is located at 530 Wiegand Way in Dixon, CA, 95620. There are no business-related assets or liabilities.
3. The Debtors are aware that, under the provisions of Title 11, US Codes §721, only the Trustee has the authority to operate the Debtors' business; and then, only with an order of the Court. Otherwise, the Trustee is obliged to shut down the business or abandon the estate's interest in the business.

1 4. However, the Debtors assert that, based on the lack of any unexempt equity in any
2 business-related asset, equipment or inventory, there is no benefit to the estate to either
3 operating OR shutting down this business.

4 5. Federal Rule of Bankruptcy Proceeding 6007(b) permits a party in interest, including the
5 Debtors, to file a motion seeking to compel the Trustee to abandon property of the
6 estate.

7 Wherefore, the Debtors move this Court to issue an Order Compelling the Trustee to
8 Abandon the Estate's Interest in the Debtors' Business.

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10 CERTIFICATION

11 I, Michael Rinne, hereby certify under penalty of perjury that I have read the foregoing
12 Motion for Order Compelling Abandonment Of The Estate's Interest In Debtors' Business. I
13 further certify that the contents thereof are true and correct to the best of my knowledge
14 and belief. Executed on January 22, 2010 at Walnut Creek, California.

15 /s/ Michael Rinne
16 Michael Rinne
17 Rinne Legal
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